

# Exhibit D

**From:** [Cooper Strickland](#)  
**To:** [Kolsky, Joshua \(CIV\)](#)  
**Cc:** [Westmoreland, Rachael \(CIV\)](#); [McMahon, Madeline M \(CIV\)](#); [Wolfson Young, Danielle \(CIV\)](#)  
**Subject:** Re: [EXTERNAL] Strickland v. United States (20cv66)  
**Date:** Monday, May 1, 2023 5:03:59 PM  
**Attachments:** [Plaintiff's Supplemental Production 5.1.23.pdf](#)  
[Plaintiff's Supplement Interrogatory Response 5.1.23 TO SERVE.pdf](#)  
[Strickland - MTE Discovery \(joint\) ^M for circulation \(2\).docx](#)  
[Proposed order for MTE \(1\) \(1\).docx](#)

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Josh,

I am following up on our conversations today.

[REDACTED]

Second, please find attached Plaintiff's supplemental interrogatory response and supplemental production. The production contains an NC Bar ethics opinion, which was provided in our prior filings with the Court, but I am providing it in Bates numbered format out of an abundance of caution. In addition, I am re-producing a payment voucher that was previously produced but was inadvertently not Bates numbered.

[REDACTED]

[REDACTED]

Sincerely,

Cooper

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CASE NUMBER 1:20CV66**

CARYN DEVINS STRICKLAND,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
UNITED STATES OF AMERICA, et al.,	)	
	)	
Defendants.	)	

**PLAINTIFF’S OBJECTIONS AND ANSWERS TO  
DEFENDANTS’ SECOND SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff Caryn Devins Strickland (“Plaintiff”), by and through undersigned counsel, hereby provides the following supplemental response to Defendants’ Interrogatory No. 2. Plaintiff hereby incorporates all objections and responses lodged in her prior Objections and Responses to Defendants’ First Set of Interrogatories. Plaintiff does not waive such objections by service of this supplemental response.

**Interrogatory No. 2:** State the name, address, and telephone number of each person you expect to call as a witness at trial in this case; the nature and substance of the witness’s expected testimony; and the witness’s relationship or connection to you (e.g., friend, relative, employer, co-worker).

**Response:** Plaintiff hereby incorporates by reference her prior response to this Interrogatory, with the following additions:

Rahwa Gebre-Egziabher  
1 Columbus Cir., NE  
Washington, DC 20544

(■■■-■■■)

Jeffrey King

Unknown Address

(■■■-■■■)

Cecilia Oseguera

Unknown Address

(■■■-■■■)

Fredilyn Sison

Grove Arcade Building

1 Page Avenue

Suite 210

Asheville, NC 28801

(■■■-■■■)

Respectfully submitted, this 1st day of May, 2023.

/s/ Cooper Strickland

Cooper Strickland

N.C. Bar No. 43242

P.O. Box 92

Lynn, NC 28750

Tel. (828) 817-3703

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*Counsel for Plaintiff*

### **VERIFICATION**

I hereby declare, under penalty of perjury, that the factual information contained in the forgoing answers of Defendants' First Set of Interrogatories is true and correct based on my personal knowledge, information and belief, or on information and documents gathered by, or presently available to, me.

Dated: May 1, 2023

Signed: /s/ Caryn Strickland  
Caryn Strickland